

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE SYMBOL TECHNOLOGIES, INC.,
SECURITIES LITIGATION

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) Case No.: 05-cv-3923
) (DRH-AKT)
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**DEFENDANTS' NOTICE OF MOTION TO COMPEL DOCUMENTS AND
INFORMATION RELATING TO THE CONFIDENTIAL INFORMANTS**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the accompanying declaration of Kathleen N. Massey made on May 5, 2016 and the Exhibits annexed thereto, Defendants Symbol Technologies Inc., William R. Nuti, Salvatore Iannuzzi, Mark T. Greenquist, Todd Abbott, Arthur O'Donnell, and James M. Conboy (collectively, "Defendants") will move this Court at the United States Courthouse, 100 Federal Plaza, Central Islip, New York 11722, at a date and time to be determined by the Court, for an order granting Defendants' motion pursuant to Rules 26(b)(1) and 37(a) of the Federal Rules of Civil Procedure, and Rules 37.1 and 37.3 of the Local Civil Rules of the Southern and Eastern Districts of New York to compel Lead Plaintiff Iron Workers Local #580 Pension Fund ("Plaintiff") to produce documents relating to the Confidential Informants referenced in the Consolidated Amended Class Action Complaint filed on August 30, 2006, and to provide information about the investigative process followed by Plaintiff's counsel before including allegations in the Complaint about what the CIs supposedly said in support of Plaintiff's claims and granting such other relief as the Court deems just and proper.

Dated: New York, New York
May 5, 2016

DECHERT LLP

By: /s/ Kathleen N. Massey

Andrew J. Levander
Kathleen N. Massey
Yelena Shreyberg
Sarah Lyons

1095 Avenue of the Americas
New York, New York 10036-6797
Telephone: (212) 698-3500
Facsimile: (212) 698-3599

Attorneys for Defendants